

Actions launched under this programme include in particular:

- application of financial security measures to Customers, depending on the degree of risk and based on „Know your Client” or KYC principle - the key concept of the programme,
- transaction registration and reporting,
- identification of suspected transactions,
- cooperation with the General Inspector of Financial Information.

Bank Millennium adjusts its reports to the analysis of suspected transactions on the on-going basis, taking into account up-to-date patterns (sectors, cash-flow routes, Customer behaviour) for effective identification and reporting of transactions suspected of money laundering.

Our internal procedures, organisational solutions and employee training programmes ensure efficient operation of the Programme.

With view to protecting Clients who invest their funds in investment products with varied degree of risk, Bank Millennium strictly monitors compliance of these products, their offering and handling process with relevant internal regulations, laws and external guidelines - on the domestic and European Union level (MiFID).

X. RESPONSIBLE BUSINESS AND CORPORATE SOCIAL RESPONSIBILITY

Bank Millennium Group considers activity in compliance with the principles of corporate social responsibility to be one of the fundamental values of its operation. CSR declarations were reflected both in the 2012 updated medium-term strategy of development for the years 2013-2015 as well as in the latest medium-term strategy for 2015-2017, published already after the end of 2014 (on 2 February 2015). These goals were also taken on board when building operational plans for the various areas of the Bank's activity. The Bank considers as particularly important to continue its growth in a sustainable way, with consideration of its impact upon the society and the environment as well as cooperation with stakeholders, based on dialogue, trust and observance of rules and principles.

The Bank attaches special importance to building long-term relations with its key Stakeholders: Customers, Employees, Suppliers, Shareholders, Social Partners and Local Communities. Just as important, in fact increasingly so, is monitoring and mitigating the Bank's adverse impact on the natural environment.

In 2013 the Bank implemented its Code of Ethics, which lays down the principles of ethical conduct of Group Employees during performance of professional duties. The principles of the Code of Ethics were communicated to all employees and awareness of them was checked by means of obligatory e-learning training. In 2014 the Bank also required its suppliers to comply with the Code of Ethics. When bidding for tendered contracts every supplier must sign a statement of compliance with the ethical principles of the Code.

An important part of the Bank's social activity is stimulating and organising employee volunteering. In 2014 together with the "United Way" foundation the Bank organised three community programmes involving employees. The employees also regularly participate in the BAKCYL youth financial education programme, which is carried out by Warsaw Banking Institute. Moreover the Bank continued to work with the WWF Foundation by issuing a card, which had part of its fees supporting the Foundations main goals. The Bank's representatives attended consultation meetings, conferences and training sessions in 2014, which were organised by government and non-government institutions working to disseminate CSR in Poland.

The Bank annually reports on its Corporate Social Responsibility activities. In March 2015 the Bank will issue the ninth annual edition of the Responsible Business report. The report will be available in electronic format in Polish and in English. The content and structure of the report satisfies criteria provided for such reporting by the Global Reporting Initiative Sustainability Guidelines (GRI G4). The report will define key aspects of the Bank's influence on sustainable economic, social and environmental development with respect to key groups of Stakeholders: Customers, Employees, Shareholders, Business Partners, the Society as well as the Natural Environment.

In 2015 the Bank will be striving to update its CSR policy and to develop a medium-term CSR strategy for Bank Millennium Group. It is also planned to involve more Stakeholders in CSR activity, with particular consideration of business partners/suppliers.

In 2014 the Bank was yet again included in the RESPECT Index - Central and Eastern Europe's first index of socially responsible companies listed on the Warsaw Stock Exchange and was also recognised in the nationwide "Ranking of Responsible Companies".

The Bank perceives cooperation with non-governmental and community institutions as an important part of its social mission. The key areas of such cooperation are:

- Culture
- Education
- Charity

Cultural activity has for years been the most important part of Bank Millennium's social activity. It is planned on the basis of medium-term action plans and following assumptions:

- The activity is exclusively programme-specific (the Bank does not support institutions but only selected programmes carried out by these institutions)
- The Bank prefers to cooperate under long-term programmes with clearly defined goals
- The Bank gives preference to high culture programmes
- The Bank strives to make sure that the programmes it supports have widespread public reach and are available also by means of the mass media (TV reports, TV rebroadcast, radio broadcasts, publications, audio/video albums, media reports)

In cultural programmes the Bank has partnered first of all with cultural institutions and non-governmental organisations (foundations and associations) as well as the media.

Most important cultural projects of Bank Millennium in 2014

- Golden Sceptre - an annual award, one of the highest in Poland (110,000 PLN plus 11,000 PLN for a debutante), presented to a Polish artist for outstanding achievement. So far it has been awarded to: Jerzy Giedroyc, Wojciech Kilar, Stanisław Lem, Roman Polański, Ewa Podleś, Sławomir Mrożek, Janusz Gajos, Tadeusz Różewicz, Maria Foltyn, Wojciech Młynarski, Krzysztof Penderecki, Józef Wilkoń, Wiesław Myśliwski, Jerzy Stuhr, Danuta Szaflarska, and Jerzy Maksymiuk. A report from the award ceremony and its accompanying concert, shown by TVP 2, has had an audience of approximately 79,5 thousands.
- Millennium Pearls - a series of artistic events organised by Bank Millennium together with Polish Television. The project comprises presentation of selected valuable television shows. In 2014 these were Television Theatre shows (TVP 1) and plays staged by the reactivated Channel Two Theatre Studio (TVP 2).
- Planet Doc Film Festival in Warsaw - the Bank is a sponsor of the largest international documentary film festival in Poland as well as accompanying events (workshops, discussions, concerts). The Bank is also the sponsor of the Millennium Award - the Festival's main award. The total festival audience in 2014 (including its editions outside Warsaw) was 35,000.

XI. ADDITIONAL INFORMATION

Other information regarding:

- Numbers and values of the execution titles issued by the bank,
- Guarantees and sureties granted,
- Transactions with related companies,
- List of the biggest court cases, arbitration proceedings before an authority or public administration,

can be found in "Consolidated financial statement of Bank Millennium Group for 2014".